

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MLEA, INC., as successor in interest to	:	CIVIL ACTION
Engineered Gas Systems, LLP and	:	
Main Line Engineering Associates,	:	NO. 02 CV 4393
	:	
Plaintiff,	:	The Honorable James McGirr Kelly
	:	
v.	:	
	:	
ATLANTIC RECYCLED RUBBER INC.	:	
	:	
and	:	
	:	
RECOVERY TECHNOLOGIES	:	
GROUP INC.	:	
	:	
and	:	
	:	
CASELLA WASTE SYSTEMS, INC.,	:	
	:	
Defendants.	:	

STIPULATION FOR EXTENSION OF PRETRIAL DEADLINES

Plaintiff, MLEA, Inc., and defendants, Atlantic Recycled Rubber, Inc. ("ARR"), Recovery Technologies Group, Inc. ("RTG") and Casella Waste Systems, Inc. ("Casella"), file this Stipulation for Extension of Pretrial Deadlines, and in support thereof, state as follows:

1. Plaintiff commenced this action with the filing of a Complaint on July 2, 2002. On September 19, 2002, defendants RTG and ARR answered plaintiff's Complaint and asserted a counterclaim. On September 19, 2002, defendant Casella answered plaintiff's Complaint.
2. Prior to incurring the costs associated with discovery, the parties attempted in good faith to resolve the disputes between them. On March 14, 2003, the parties participated in

mediation before the Honorable Louis C. Bechtle through ADR Options, Inc. Pending the outcome of the mediation, the parties requested, and this Court approved, a Stipulation to amend the October 26, 2003 Preliminary Conference and Scheduling Order to extend fact discovery to July 29, 2003.

3. Negotiations between the parties, through Judge Bechtle, continued until recently. The defendants made an offer to plaintiff, and that offer remains under consideration.

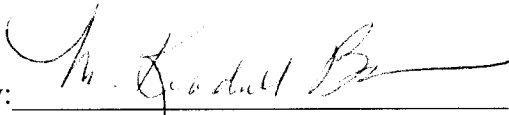
4. During the course of conducting discovery, it has become apparent that because of the staggered and conflicting trial, deposition, and vacation schedules of plaintiff's and defendants' counsel throughout the summer months, and the difficulty encountered in scheduling depositions of certain witnesses, who reside out of state and in Canada, the discovery cutoff date of July 29, 2003 is unrealistic.

5. The parties agree that a sixty (60) day extension of time is necessary to allow the parties to proceed with orderly discovery, and hereby request that this Court approve this Stipulation to extend the discovery deadline for a period of sixty (60) days until September 29, 2003.

6. The parties are diligently working to complete discovery by the proposed deadline and are finalizing an appropriate deposition schedule in accordance with that deadline.

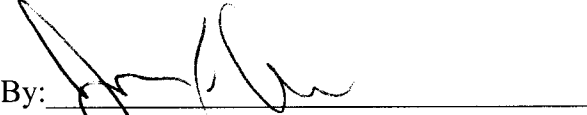
WHEREFORE, plaintiff, MLEA, Inc., and defendants, Atlantic Recycled Rubber, Inc., Recovery Technologies Group, Inc. and Casella Waste Systems, Inc. file this Stipulation seeking an extension of the pretrial deadlines for sixty (60) days.

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Dated: July 7, 2003

APPROVED: _____
James McGirr Kelly, J.

Dated: _____